

The Honorable Marc Barreca  
Chapter 7  
Hearing Date: December 13, 2018  
Hearing Time: 9:30 AM  
Hearing Location: US Courthouse /Seattle, WA

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:

Case No.: 12-11284-MLB

DEMETRIUS BERTRAND DICKERSON SR.,

Chapter: 7

Debtor.

DEBTOR'S WITNESS AND EXHIBIT LIST

The Chapter 7 Debtor, Demetrius Bertrand Dickerson, ("Debtor") hereby submits its non-expert witnesses and exhibit list pursuant the Court's Notice of Evidentiary Hearing and Order Setting Deadlines, Dkt. No. 61.

**I. Non-Expert Witnesses**

1. Jason Woehler (In House Counsel for Merchants Credit)  
c/o Marc Rosenberg  
180 One Convention Place  
701 Pike Street  
Seattle, WA 98101  
(206) 624-7990  
[mr@leesmart.com](mailto:mr@leesmart.com)

DEBTOR'S WITNESS AND EXHIBIT LIST - 1

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- 1           2.     Merchants Credit Corporation's Rule 30(b)(6) Witness  
2                 c/o Marc Rosenberg  
3                 180 One Convention Place  
4                 701 Pike Street  
5                 Seattle, WA 98101  
6                 (206) 624-7990  
7                 [mr@leesmart.com](mailto:mr@leesmart.com)  
8  
9           3.     Alex Sandoval (Compliance Officer for Merchants Credit)  
10                c/o Marc Rosenberg  
11                180 One Convention Place  
12                701 Pike Street  
13                Seattle, WA 98101  
14                (206) 624-7990  
15                [mr@leesmart.com](mailto:mr@leesmart.com)  
16  
17           4.     Carol Taylor (Operations Manager for Merchants Credit)  
18                c/o Marc Rosenberg  
19                180 One Convention Place  
20                701 Pike Street  
21                Seattle, WA 98101  
22                (206) 624-7990  
23                [mr@leesmart.com](mailto:mr@leesmart.com)  
24  
25           5.     Debtors may also call rebuttal witnesses that do not have to identified at this time.  
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**II.     EXHIBIT LIST**

Num ber	Exhibit	Date
D1	Merchants Credit Collection Notes	N/A
D2	Copy of the Dickerson's King County Marriage Record	7/2/2007
D3	Summons and Complaint, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	11/6/2009
D4	Motion, Affidavit and Order for Default Judgment, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	1/7/2010
D5	Writ of Garnishment of Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	2/26/2010
D6	First Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	3/22/2010

D7	Second Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	6/14/2010
D8	Judgment and Order to Pay, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	7/2/2010
D9	Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/27/2010
D10	Second Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	11/17/2010
D11	Judgment and Order to Pay, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	12/13/2010
D12	First Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	2/22/2011
D13	Second Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	5/06/2011
D14	Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	7/06/2011
D15	First Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	7/29/2011
D16	Release of Writ of Garnishment, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/5/2011
D17	Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	1/26/2012
D18	First Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	2/8/2012
D19	Release of Writ of Garnishment, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	3/8/2012

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D20	King County District Court Notice of Pending Dismissal for Inactivity, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	10/01/2015
D21	Application for Writ of Garnishment, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	4/18/2018
D22	First Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	5/11/2018
D23	First Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	5/16/2018
D24	Second Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	6/29/2018
D25	Merchants Credits' Application for Judgment on Answer and Order to Pay, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/9/2018
D26	Merchants Credits' Certification of Garnishment Costs, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/9/2018
D27	Merchants Credit's Declaration of Service of Writ of Garnishment by Certified Mail, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/9/2018
D28	Merchants Credit's Judgment and Order to Pay (signed order), Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/9/2018
D29	Merchants Credit Military Status Declaration, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/9/2018
D30	Merchants Credit's Release of Writ of Garnishment, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	9/21/2018
D31	King County District Court Docket regarding Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172	12/7/2018
D32	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (0199 20180430)	4/30/2018
D33	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (0799 20180503)	5/3/2018

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D34	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1099 20180510	5/10/2018
D35	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (0599_20180501_170722_001411_i_2067241586_4256432613_0)	5/1/2018
D36	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (0999_20180508_154947_001327_i_2067241586_4256432613_1)	5/1/2018
D37	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1599_20180518_134809_001414_i_2067241586_4256432613_0)	5/18/2018
D38	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1199_20180514_171013_000655_i_2067241586_4256432613_0)	5/14/2018
D39	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (0699_20180502_082136_000547_i_2067241586_4256432613_0)	5/2/2018
D40	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1299_20180515_170753_000549_i_2067241586_4256432613_0)	5/15/2018
D41	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (0499_20180501_153101_000059_i_2067241586_4256432613_140)	5/1/2018
D42	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1399_20180516_090025_000228_i_2067241586_4256432613_0)	5/16/2018
D43	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1499_20180516_154713_001249_i_2067241586_4256432613_0)	5/16/2018
D44	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1699_20180521_080003_000351_i_2067241586_4256432613_0)	5/21/2018
D45	Chapter 7 Bankruptcy Petition for Demetrius Bertrand Dickerson, Case No. 12-11284-MLB, Dkt No. 1	2/12/2012
D46	Chapter 7 Bankruptcy 341 Meeting of Creditor Notice (with BNC mailing) for Demetrius Bertrand Dickerson, Case No. 12-11284-MLB, Dkt No. 9	
D47	Chapter 7 Bankruptcy Discharge of Demetrius Bertrand Dickerson (with BNC mailing), Case No. 12-11284-MLB, Dkt No. 13	6/14/2012
D48	Motion for Sanctions for Violation of the Discharge Injunction, Case No. 12-11284-MLB, Dkt No. 24	7/25/2018

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D49	Email to Jason Woehler re Subpoena re Motion for Discharge Violation with Subpoena with Exhibit A attached	7/30/218
D50	Email to Jason Woehler re Subpoena re Motion for Discharge Violation with Letter attached	8/1/2018
D51	Email correspondence with Jason Woehler re Deposition date	8/1/2018
D52	Email to Jason Woehler rerevised Subpoena re Motion for Discharge Violation with Subpoena with Exhibit A and Exhibit B attached	8/2/2018
D53	Fax Sent to Merchants Credit Corporation, Letter from Andrew Gebelt re Discharge dated 8/1/2012	4/3/2018
D54	Merchants Credit Collection Notes	N/A
D55	Fax from Shirley Dickerson to David Fagan at Merchants Credit Corporation	5/14/2018
D56	Letter from Christina L Henry to David Quigley at Merchants Credit Re Discharge Violation	6/8/2018
D57	Merchants Credits' Policies and Procedures regarding Garnishment and Bankruptcy	N/A
D58	Pacer Search	N/A
D59	Internal Merchants Credit Email from Cassandra Downs to Jason Woheler	5/3/2018
D60	Copy of Jason Woehler's Outlook Calendar for June 2018 through August 2018.	6/4/2018 to 8/31/2018
D61	Internal Merchants Credit Email from Danielle Arrasmith to Jason Woheler	7/26/2018
D62	Internal Merchants Email correspondence between Danielle Arrasmith and Jason Woehler	7/26/2018
D63	Internal Merchants Email correspondence between Jason Woehler and James Dickmeyer	8/3/2018
D64	Internal Merchants Email correspondence between Jason Woehler and James Dickmeyer	8/21/2018
D65	Internal Merchants Email correspondence between Jason Woehler and James Dickmeyer	8/21/2018
D66	Internal Merchants Email correspondence regarding release of garnishment	8/29/2018
D67	Internal Merchants Email correspondence between Danielle Arrasmith and Jason Woehler	5/1/2018
D68	Invoice from Jim Dickmeyer to Merchants for services rendered	9/1/2018

Respectfully submitted this 7<sup>th</sup> day of December 2018.

*/s/ Christina L. Henry*

Christina L. Henry, WSBA # 31273

Henry & DeGraaff, PS

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DEBTOR'S WITNESS AND EXHIBIT LIST - 6

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CERTIFICATE OF SERVICE

I, Christina L Henry, declare under penalty of perjury as follows:

1. I am over the age of eighteen years, a citizen of the United States, not a party herein, and am competent to testify to the facts set forth in this Declaration.

2. That on December 7, 2018, I caused the foregoing document attached to this Certificate of Service along with attached exhibits upon the following individuals via CM/ECF:

James E. Dickmeyer on behalf of Creditor Merchants Credit Corporation [jim@jdlaw.net](mailto:jim@jdlaw.net),  
[jim.dickmeyer@gmail.com](mailto:jim.dickmeyer@gmail.com)

Marc Rosenberg on behalf of Creditor Merchants Credit Corporation [mr@leesmart.com](mailto:mr@leesmart.com)

Christina L Henry on behalf of Debtor Demetrius Bertrand Dickerson, Sr [mainline@hdm-legal.com](mailto:mainline@hdm-legal.com), [HenryDeGraaffPS@jubileebk.net](mailto:HenryDeGraaffPS@jubileebk.net)

James Rigby [rigbylaw@aol.com](mailto:rigbylaw@aol.com), [jr@trustesolutions.com](mailto:jr@trustesolutions.com); [jr@trustesolutions.net](mailto:jr@trustesolutions.net);  
[patti@liveslaw.com](mailto:patti@liveslaw.com)

United States Trustee [USTPRegion18.SE.ECF@usdoj.gov](mailto:USTPRegion18.SE.ECF@usdoj.gov)

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING STATEMENT IS BOTH TRUE AND CORRECT.

Dated this December 7, 2018, at Seattle, Washington.

/s/ Christina L Henry  
Christina L Henry